# IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

KANEKA CORPORATION,

Plaintiff.

CIVIL ACTION FILE

v.

NO. 3:10-cv-01430-P

JBS HAIR, INC. and UNO & COMPANY, LTD.,

Defendant

# DEFENDANTS' UNOPPOSED MOTION TO EXTEND TIME TO FILE AN ANSWER OR OTHERWISE RESPOND

Defendants JBS Hair, Inc. (hereinafter "JBS Hair") and UNO & Company, Ltd. ("UNO") file this Unopposed Motion to Extend Time to File an Answer or Otherwise Respond, and in support thereof, respectfully show as follows:

- 1. This case was filed by Plaintiff Kaneka Corporation ("Kaneka"), on July 20, 2010.
- 2. JBS Hair was served with a copy of the Summons and Complaint and, pursuant to the Court's order of August 13, 2010, JBS Hair's deadline to file a responsive pleading was extended through September 10, 2010.
- 3. UNO is a Korean corporation. On September 10, 2010, UNO engaged United States counsel and agreed to waive service of process in this matter in exchange for the agreement of plaintiff's counsel that responsive pleadings for both UNO and JBS Hair would be due on or before October 29, 2010. By extending both responsive pleading deadlines so they coincide, the case's calendar can be set on a single track once both defendants have answered.

Plaintiff's counsel has agreed to the request for an extension of the responsive pleading deadline for both Defendants.

4. Accordingly, Defendants UNO and JBS Hair respectfully request an extension of time through and including October 29, 2010 to file an answer, motion or otherwise plead in response to Plaintiff's Complaint.

Respectfully submitted,

HALLETT & PERRIN, P.C.

/s/ Robert L. Rickman
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ATTORNEYS FOR DEFENDANT JBS HAIR, INC. and UNO & COMPANY, LTD.

### **CERTIFICATE OF CONFERENCE**

Counsel for Defendants UNO & Company, Ltd., and JBS Hair, Inc. has conferred with counsel for Plaintiff Kaneka Corporation regarding the relief requested in this motion. As a result of this conference, Plaintiff does not oppose this motion.

/s/ Robert L. Rickman
Robert L. Rickman

## **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing was sent to the following counsel and/or parties via first class United States mail, and/or via the Court's ECF system, on September 10, 2010:

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> /s/ Robert L. Rickman Robert L. Rickman